

**From:** Donovan, Caroline  
**Sent:** Thursday, June 25, 2020 4:36 PM  
**To:** Bach, Jonathan  
**Cc:** Leonetti, Ken; mtremonte@shertremonte.com; mcuccaro@shertremonte.com; Julian S. Brod  
**Subject:** RE: Gorsoan/Bullock

Jonathan,

Nice to speak with you as well. I can confirm that the attached documents govern as far as the Protective Order. Also, we're agreed that the list of search terms you provided covers the protocol as memorialized in the email of August 5, 2018 (Dkt. No. 55 at 222), subject to the following: The Court had previously ordered that Bullock produce all documents concerning the Landmark Trust (Dkt. No. 44), so could you please ensure that all of those documents are included among the documents searched and produced.

We have inquired of our client about a modest extension (potentially involving a rolling production starting on or before July 15), so I will let you know once I hear back. In the meantime, I will call you tomorrow to provide you with the firm's wire information for payment of the awarded fees and costs.

Best,  
Caroline

**Caroline S. Donovan** | Partner  
Pronouns: she, her, hers



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**From:** Jonathan Bach  
**Sent:** Wednesday, June 24, 2020 3:59 PM  
**To:** Donovan, Caroline  
**Cc:** Michael Tremonte ; Mark Cuccaro ; Julian S. Brod  
**Subject:** Gorsoan/Bullock

Caroline:

Good to talk to you this morning. I write to confirm what we agreed upon:

1. The attached protective order, dated December 23, 2016, applies (see two related documents).

2. We will apply the search terms as agreed by email on August 5, 2018, in searching for potentially responsive materials. I have attached a list of those terms for ease of reference. We will apply those search terms to the email accounts [janna@jannabullock.com](mailto:janna@jannabullock.com) and [jannabullock@aol.com](mailto:jannabullock@aol.com) as collected by the Sher Tremonte firm on November 17, 2016. Per your request, I have confirmed that Sher Tremonte instructed its forensic vendor at that time to image the full accounts.
3. We do not anticipate asserting a Fifth Amendment privilege.

As we also discussed, I will likely need more time to comply with the judge's order. Among other things, I am flying to Los Angeles on June 30 for an arbitration that is currently scheduled to end July 15. I intend to get the process up and running in the meantime and to move as quickly as possible, but I think it is inevitable we will need more time. Please let me know if you will agree to extend the deadline. Thanks,

Jonathan

Jonathan P. Bach

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